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June 13, 2015

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120 Bloomingdale Rd.
Suite 400
White Plains, NY 10605

via email only: wweathers@cabanillaslaw.com and ECF

In re: Marin, Debra 12-23649

My File No: 36676

Dear Ms Weathers:

Yesterday, pursuant to Court Order you were served with a Notice to Produce and Notice to Take Deposition of Carla Marin. Both documents were filed on ECF in the event you have not yet received them in the mail. Pursuant to the Court's Scheduling and Pre-Trial Order:

"In the event of dispute over discovery, the parties' counsel shall promptly confer to attempt in good faith to resolve the dispute. If, notwithstanding their good faith efforts to do so, they are unable to resolve a discovery issue, they shall promptly inform the Court by letter of the nature of the dispute and request a telephonic discovery conference. At the conference, the Court will ask the parties about their prior efforts to resolve the dispute."

As you know the Court also set the hearing for July 30, 2015. If there is <u>any</u> dispute as to <u>any</u> document sought in the Notice to Produce  $\overline{\text{OR}}$  conflict in the date or time of the Deposition, I ask that you contact me forthwith. I cannot wait until the July 10, 2015 production date or the July 15, 2015 discovery deadline.

Very truly yours,

/s

Michael H. Schwartz